

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

V.

TIMOTHY LEIWEKE

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§

CRIM NO.: 25-CR-344 (ADA)

**NOTICE OF REQUEST TO DISCLOSE ALL EVIDENCE GOVERNMENT
INTENDS TO OFFER UNDER FEDERAL RULE OF EVIDENCE 404(b)**

Tim Leiweke moves for notice of all evidence that the government intends to offer pursuant to Federal Rule of Evidence 404(b), including without limit:

1. A description of the other crime, wrong, or act the government intends to offer, including the date(s) or place(s) the other crimes, wrongs, or acts allegedly occurred;
2. The names and addresses of all persons who were witnesses to or have knowledge of such crime, wrong, or act;
3. Copies of all documents, materials, or other tangible objects that are relevant to such crime, wrong, or act, and all documents, materials or other tangible objects that the government intends to offer into evidence in conjunction with such Rule 404(b) evidence;
4. All evidence that is exculpatory within the purview of *Brady v. Maryland*, 373 U.S. 83 (1963), with regard to such other crimes, wrongs, or acts evidence, including without limit all evidence that detracts from the probative value of such evidence or that indicates that the probative value of the evidence might be outweighed by its prejudicial effect; and
5. A statement of the purpose for which such evidence would be offered, *i.e.*, to show motive, or opportunity, or intent, etc.

Respectfully submitted,

/s/ David Gerger

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**ATTORNEYS FOR TIMOTHY
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CERTIFICATE OF CONFERENCE

We have conferred with the government which will respond in writing to us.

/s/ David Gerger

David Gerger

CERTIFICATE OF SERVICE

This pleading was filed electronically with the Court, serving all parties.

/s/ David Gerger

David Gerger